SERFF Tracking Number:
 NGLI-125814219
 State:
 Arkansas

 Filing Company:
 National Guardian Life
 State Tracking Number:
 40274

Company Tracking Number: 80 CSO PN

TOI: L07G Group Life - Whole Sub-TOI: L07G.114 Single Premium - Single Life - Funeral

Expense

Product Name: 80CSO Continuation - PN

Project Name/Number: 80CSO Continuation - PN/80 CSO PN

Filing at a Glance

Company: National Guardian Life

Product Name: 80CSO Continuation - PN SERFF Tr Num: NGLI-125814219 State: ArkansasLH TOI: L07G Group Life - Whole SERFF Status: Closed State Tr Num: 40274

Sub-TOI: L07G.114 Single Premium - Single Co Tr Num: 80 CSO PN State Status: Filed-Closed

Life - Funeral Expense

Filing Type: Form Co Status: Reviewer(s): Linda Bird

Author: Peggy Kratz Disposition Date: 09/19/2008

Date Submitted: 09/12/2008 Disposition Status: Accepted For

Informational Purposes
Implementation Date:

Implementation Date Requested: 01/01/2009

State Filing Description:

General Information

Project Name: 80CSO Continuation - PN Status of Filing in Domicile: Pending

Project Number: 80 CSO PN

Date Approved in Domicile:

Requested Filing Mode: Informational

Domicile Status Comments:

Explanation for Combination/Other: Market Type: Group

Submission Type: New Submission Group Market Size: Large

Overall Rate Impact: Group Market Type: Association

Filing Status Changed: 09/19/2008

State Status Changed: 09/19/2008 Deemer Date:

Corresponding Filing Tracking Number:

Filing Description:

The purpose of this filing is to advise of our intent to continue to use the 1980 CSO Mortality Tables, beyond January 1, 2009, for policy forms previously approved for use in the Preneed market.

Please see cover letter for details.

SERFF Tracking Number: NGLI-125814219 State: Arkansas
Filing Company: National Guardian Life State Tracking Number: 40274

Company Tracking Number: 80 CSO PN

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Expense

Product Name: 80CSO Continuation - PN

Project Name/Number: 80CSO Continuation - PN/80 CSO PN

Company and Contact

Filing Contact Information

Peggy Kratz, Senior Policy Forms Specialist plkratz@nglic.com

P.O. Box 1191 (608) 443-5325 [Phone] Madison, WI 53701-1191 (608) 443-5365[FAX]

Filing Company Information

National Guardian Life CoCode: 66583 State of Domicile: Wisconsin

P.O. Box 1191 Group Code: Company Type: LAH Madison, WI 53701-1191 Group Name: State ID Number:

(800) 626-7931 ext. 5790[Phone] FEIN Number: 39-0493780

Filing Fees

Fee Required? Yes
Fee Amount: \$50.00
Retaliatory? No

Fee Explanation:

Per Company: No

COMPANY AMOUNT DATE PROCESSED TRANSACTION #

National Guardian Life \$50.00 09/12/2008 22461388

SERFF Tracking Number: NGLI-125814219 State: Arkansas
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Project Name/Number: 80CSO Continuation - PN/80 CSO PN

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Accepted For Linda Bird		09/19/2008	09/19/2008
Informationa	l		
Purposes			

SERFF Tracking Number: NGLI-125814219 State: Arkansas
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Product Name: 80CSO Continuation - PN

Project Name/Number: 80CSO Continuation - PN/80 CSO PN

Disposition

Disposition Date: 09/19/2008

Implementation Date:

Status: Accepted For Informational Purposes

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: NGLI-125814219 State: Arkansas

Filing Company: National Guardian Life State Tracking Number: 40274

Company Tracking Number: 80 CSO PN

TOI: L07G Group Life - Whole Sub-TOI: L07G.114 Single Premium - Single Life - Funeral

Expense

Product Name: 80CSO Continuation - PN

Project Name/Number: 80CSO Continuation - PN/80 CSO PN

Item Type Item Name Item Status Public Access

Supporting Document Certification/Notice No

Supporting Document Application No

Supporting Document Cover Letter Yes

SERFF Tracking Number: NGLI-125814219 State: Arkansas

Filing Company: National Guardian Life State Tracking Number: 40274

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Expense

Product Name: 80CSO Continuation - PN

Project Name/Number: 80CSO Continuation - PN/80 CSO PN

Rate Information

Rate data does NOT apply to filing.

SERFF Tracking Number: NGLI-125814219 State: Arkansas 40274

Filing Company: National Guardian Life State Tracking Number:

Company Tracking Number: 80 CSO PN

TOI: L07G Group Life - Whole Sub-TOI: L07G.114 Single Premium - Single Life - Funeral

Expense

Product Name: 80CSO Continuation - PN

80CSO Continuation - PN/80 CSO PN Project Name/Number:

Supporting Document Schedules

Review Status:

Cover Letter Satisfied -Name: 09/12/2008

Comments: **Attachment:** AR 2001.pdf

September 12, 2008

Arkansas Department of Insurance - SERFF

RE: National Guardian Life Insurance Company

NAIC # 66583 - FEIN# 39-0493780

Informational Filing: 80 CSO vs. 2001 CSO

Preneed Life Insurance Policy Forms

To Whom It May Concern:

The purpose of this filing is to advise you of our intent to continue to use the 1980 CSO mortality tables beyond January 1, 2009, for any "Preneed" policy forms that were previously approved by your Department. We will also use the 1980 CSO mortality tables for any new Preneed policy forms not yet filed for approval.

The "Preneed Life Insurance Minimum Standards for Determining Reserve Liabilities and Nonforfeiture Values Model Regulation" was recently approved by the NAIC. This model requires that preneed insurance policies utilize the 1980 CSO mortality tables in determining the minimum standard of valuation of reserves and the minimum standard nonforfeiture values for preneed insurance products. The 2001 CSO table does not appropriately reflect the mortality experience of Preneed Life Insurance.

The industry is encouraging all states that have not yet done so, to adopt this regulation prior to year end. This Model Regulation was unanimously approved at each level of its passage through the NAIC. Support of this nature underscores the need, importance and urgency of adopting this regulation. This is essential to maintain reserves for preneed life policies at the appropriate level, while preserving nonforfeiture values that provide more benefit to policyholders, keeping a level playing field for all industry participants and ensuring favorable tax treatment.

We will continue to sell the following previously approved policy forms after January 1, 2009, using the 1980 CSO mortality tables:

Policy Form:	Date of Approval:
NPNCERTSP2002	11/21/2002
NPNCERTMP2002	11/21/2002
NPNCERTMP2002-GDB	11/212002
NIPNCRTMP2007-AR	2/13/2008
NIPNCRTSP2007-AR	2/13/2008
NPNCRTSPAG2006	9/26/2006
NPNCRTMPAG2006-AR	9/26/2006

Your acknowledgement of this information would be greatly appreciated to confirm our continued use of the 1980 CSO mortality tables.



Sincerely, Peggy Kratz

Senior Policy Forms Specialist

National Guardian Life Insurance Company

(800) 626-7931 ext. 5325

plkratz@nglic.com